

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION**

**Case No. 9:24-cv-80395-RLR-BER**

GREENFLIGHT VENTURE CORPORATION

Plaintiff,

v.

GOOGLE LLC,

Defendant.

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**DEFENDANT GOOGLE LLC'S UNOPPOSED MOTION FOR ENLARGEMENT OF  
TIME TO FILE JOINT SCHEDULING REPORT**

Defendant Google LLC ("Google"), pursuant to Federal Rule of Civil Procedure 6(b) and without opposition from Plaintiff's counsel, respectfully requests an enlargement of time of two (2) days, until August 22, 2024, for the Parties to file their Joint Scheduling Report. In support of this request, Google states as follows:

1. On August 14, 2024, the Court entered an order requiring the Parties to submit a joint scheduling report by August 20, 2024.
2. On August 19, 2024, Plaintiff sent a draft scheduling report (without scheduling order dates) to Google for the first time.
3. On August 20, 2024, Plaintiff sent a draft scheduling order including various patent specific deadlines. On this same date, the Parties met and conferred by Zoom on the proposed schedule and by email and agreed to a complex schedule under the Local Rules. Google also sent redlined revisions to the draft which included patent specific deadlines. At 7:12 p.m., Plaintiff advised it disagreed with certain revisions to the joint report and added specific contentions about

its case, but left in the patent specific deadlines. In light of the various statements by Plaintiff as to the merits of its case, Google provided further revisions to the report (without revision to the schedule) at 8:43 p.m. However, at 9:29 p.m., Plaintiff's counsel advised that the joint report needed further edits due to issues with the joint schedule and requested that Google file an extension of time as it was not available to further meet and confer. At 9:53 p.m., Plaintiff advised that the issues with the joint schedule related to its new objection as to patent specific deadlines which had been included in all of the exchanged drafts.

4. Due to the nature of the case, Google believes that patent specific deadlines are important to simplify the issues and requests further time to meet and confer with Plaintiff to understand the last-minute change in position.

5. Good cause exists for this motion and the requested enlargement. The Parties have been cooperating to attempt to present an agreeable joint schedule rather than competing schedules. Google believes that further meet and confer could potentially resolve the differences between the Parties. Plaintiff further requested that this extension be sought. Additionally, the additional time is required due to other professional demands, including depositions scheduled in the coming days that could impact any attempted conferral.

6. The requested extension is made in good faith and not sought for the purpose of delay.

7. Plaintiff will suffer no prejudice from the requested extension and does not oppose the relief requested herein, so this enlargement of time will not cause any undue delay, but could create judicial and party efficiency by streamlining the issues.

**WHEREFORE**, Google respectfully requests that this Court grant the Parties a two-day enlargement of time until August 22, 2024, within which to submit their Joint Scheduling Report.

**LOCAL RULE 3.01(g) CERTIFICATION**

Counsel for Google conferred with counsel for Plaintiff as to the relief requested herein, and counsel for Plaintiff has advised that it does not oppose the relief requested herein.

Dated: August 20, 2024

Respectfully submitted,

/s/ Sujey Herrera

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 20, 2024, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notice of Electronic Filing generated by CM/ECF.

By: /s/ Sujey Herrera  
Sujey Herrera